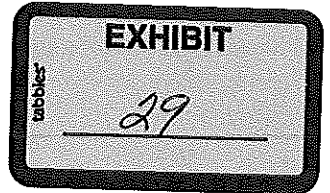




# *The Torrington Country Club, Inc.*

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Connecticut Department of Environmental Protection  
Public Hearing, January 21, 2010

Written comments of Edward M. Goodhouse, golf course superintendent, Torrington Country Club, Goshen CT

Since its inception in the late 1920's the Torrington Country Club, Inc. in Goshen has used water from Ivy Mountain Brook to irrigate its golf course. Ivy Mountain Brook is a small stream at the top of the Bantam River system (subregional basin #6705). Ivy Mountain Brook drains a watershed area of approximately 2 square miles.

In 2003, Torrington Country Club submitted a general permit application for an unregistered water supply system. In December of 2004 the DEP approved an authorization allowing Torrington Country Club to withdraw up to 111,000 gallons per day from Ivy Mountain Brook between April 15 and October 31. This authorization was to expire on June 27, 2007. In the cover letter that came with the authorization permit Denise Ruzicka informed Torrington Country Club that because of concerns for fish populations in Ivy Mountain Brook the DEP would not renew the authorization under the General Permit when it expired in June of 2007.

It was clear that Torrington Country Club would have to develop a new irrigation water diversion by drilling bedrock wells, constructing a retention pond, and reconfiguring its irrigation system in order to provide the golf course with irrigation water. It was also clear that this could not be accomplished before June of 2007 and that this work would be expensive. In a meeting that took place in March, 2005 Ms. Ruzicka and her staff agreed to renew Torrington Country Club's authorization under the General Permit for an additional 3 year period. Torrington Country Club had until May 31, 2010 to develop a new withdrawal.

Accordingly Torrington Country Club hired consultants; drilled and hydrofractured 3 bedrock wells; and conducted yield tests on those wells and monitored neighbor's wells during the yield tests. An environmental study of the local areas likely to be influenced by this new withdrawal was conducted; plans were drawn up for enlarging an existing pond on Torrington Country Club property to serve as an irrigation water reservoir; an individual permit application for a new withdrawal was submitted to the DEP; and all necessary permits were obtained from the Town of Goshen.

In June of 2009 the DEP approved Torrington Country Club's permit application and issued an individual authorization that will expire in June 2019. Torrington Country Club has now enlarged and deepened an existing pond; built a pump house; and installed new



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irrigation pumps. It has also been necessary to run three phase electrical power to the new pump house, a distance of about 1,200 feet.

To date this project has cost Torrington Country Club about \$600,000. (Consultants \$128,000; wells \$44,000; pond construction \$180,000; new irrigation pumps \$82,000; pump house \$44,000; electrical work \$54,000; 2000 feet of 8 inch irrigation main \$38,000; well monitoring equipment \$10,000; pond aerators \$10,000).

As I understand the proposed stream flow regulations it appears that many golf courses with registered and permitted diversions may be required to limit their withdrawals from the State's surface waters. That is the situation that we at Torrington Country Club found ourselves in. Starting in 2005, Torrington Country Club, Inc., developed a new diversion by drilling wells on its property, enlarging and deepening a course pond, and installing new irrigation pumps to move water from that pond out onto the golf course. This was done because the DEP had concerns for fish populations in Ivy Mountain Brook, a small stream that flows through the Torrington Country Club property. Ivy Mountain Brook has been Torrington Country Club's source for irrigation water since the 1920's when construction of the course started. Torrington Country Club worked closely with the Inland Water Resources Division of the DEP during this process in order to be in compliance with State regulations.

The development of this newly permitted withdrawal has been expensive and time consuming. To date Torrington Country Club has spent approximately \$600,000 on this project. This in a period when our membership has been steadily decreasing. Torrington Country Club is not "high-end". We are a small business, but we are the largest private employer and tax payer in the town of Goshen, and our continued economic viability is important to Northwest Ct. Torrington Country Club is not unlike many other state golf course and other small businesses. I urge you to seriously consider the economic impact of these regulations.

Respectfully,

Edward M. Goodhouse